



JUN 19 2012

Section 5: 510(k) Summary

K1V3 033

**Date Premarket Notification Summary was Prepared**

This 510(k) premarket notification summary was prepared **February 02, 2012** in conjunction with the notification.

**Applicant Name & Address**

Nephron Pharmaceuticals Corporation  
4121 SW 34<sup>th</sup> Street  
Orlando, FL 32811  
(407) 246-1389  
(407) 872-0001 *Fax*

**Contact Persons**

Lou Kennedy  
*President/CEO*

Marcus Juliano  
*Vice President, Quality Assurance & Regulatory Affairs (regulatory contact)*

Kimberly Grevera  
*Manager, Regulatory Affairs (regulatory contact)*

**Proprietary or Trade Name:** Sodium Chloride Inhalation Solution USP, 0.9%

**Common/Usual Name:** Saline Solution

**Classification Name:** Nebulizer (Direct Patient Interface) – Accessory  
CAF – 868.5630  
Class II

**Device:** Inhaled saline solution – 0.9%

**Predicated Devices:** Holopack – K972466  
Steripak – K980829



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### Device Description

The subject device is 3mL or 5 mL Sodium Chloride Inhalation Solution USP, 0.9%. The single-use device is a color-coded (pink) blow-fill-sealed, low density polyethylene (LDPE) vial containing sterile, preservative-free, clear, colorless, aqueous solution as labeled for inhalation therapy (respiratory therapy and tracheal lavage). For respiratory therapy, Sodium Chloride Inhalation Solution USP, 0.9% is used for dilution of solutions used in nebulizers. The product contains 0.9% w/v Sodium Chloride USP in Water for Injection USP. The formulation contains no additives.

Contents	Volume	Container
0.9% Sodium Chloride Inhalation Solution, USP	3mL Fill	Pink, Embossed Label
0.9% Sodium Chloride Inhalation Solution, USP	5mL Fill	Pink, Embossed Label

### Indications for Use

This sterile, single-use device is intended to be used as an accessory to medicinal nonventilatory nebulizers for respiratory therapy or for tracheal irrigation or lavage therapy.

### Limitations for Use

This device is not intended for parenteral use or for preparations intended for parenteral use. The use of this device requires prescription.

### Technological Characteristics of the Subject Device and Predicate Devices

The subject unit-dose device of this premarket notification is formed of polyethylene resins meeting the direct food and drug contact criteria. The formed units meet the criteria for direct food and drug contact as prefilled unit containers. The solution component, at the stated concentration of Sodium Chloride Inhalation Solution, meets the USP monograph requirements.

The single-use containers are embossed with identifying product text.

The finished device product configuration characteristics of this inhalation device are similar to those of the predicate devices.

The Blow/Fill/Seal system on which this device is manufactured represents technological advances in the production of this device for inhalation therapy and in the control of the manufacturing environment. This device is manufactured under conditions of current Good Manufacturing Practices (cGMP).

There are no technological differences between the subject device and predicate devices that raise new questions of safety and effectiveness. Performance characteristics of this device that is the subject of this notification are equal to or greater than the predicate devices.



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### **Nonclinical and Clinical Testing**

The component materials of the accessory device container have been substantiated to each meet the criteria for direct food and drug contact or additive respectively. The formulation components of the filled device solution have been substantiated to each meet their respective USP monograph criteria. The finished device undergoes testing to meet the stated USP monograph and container criteria.

Clinical testing is not necessary to show substantial equivalence for either safety or efficacy of intended use to the predicate devices as there are several various in vitro analytical methods (assay; fill uniformity; sterility; container integrity) and physical-chemical characteristics (solution properties; unit configuration) available which demonstrate this equivalence.

### **Summary Conclusions**

The subject device:

0.9% Sodium Chloride Inhalation Solution, USP

as manufactured by Nephron Pharmaceuticals Corporation of Orlando, FL claims substantial equivalence, with the same intended use, to several devices which have received market clearance through established equivalence.

This device is designed to meet current USP specifications. The device containers have embossed unit identification and shelf carton labeling so that label requirements are met.

Analytical testing to the stated specifications demonstrates that this device will have comparable safety and efficacy in use.

The device, as manufactured by Nephron, is produced using Blow Fill Seal technology specifically designed for aseptic filling operations. These manufacturing systems represent a technological advance for the production of these types of devices.



## DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration  
10903 New Hampshire Avenue  
Document Control Room -WO66-G609  
Silver Spring, MD 20993-0002

JUN 19 2012

Mr. Marcus Juliano  
Vice President  
Nephron Pharmaceutical Corporation  
4121 S.W. 34<sup>th</sup> Street  
Orlando, Florida 32811-6475

Re: K113033

Trade/Device Name: Sodium Chloride Inhalation Solution USP, 0.9%  
Regulation Number: 21 CFR 868.5630  
Regulation Name: Nebulizer  
Regulatory Class: II  
Product Code: CAF  
Dated: May 3, 2012  
Received: May 4, 2012

Dear Mr. Juliano:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

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Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

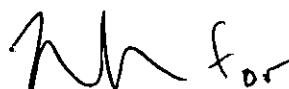
If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please go to

<http://www.fda.gov/AboutFDA/CentersOffices/CDRH/CDRHOffices/ucm115809.htm> for the Center for Devices and Radiological Health's (CDRH's) Office of Compliance. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to

<http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm> for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address  
<http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>.

Sincerely yours,



Anthony D. Watson, B.S., M.S., M.B.A.  
Director  
Division of Anesthesiology, General Hospital,  
Infection Control and Dental Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure



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Section 4: Indications for Use Statement

**510(k) Number:** Not Known

**Device Name:** Sodium Chloride Inhalation Solution USP, 0.9%

**Indications for Use:**

This sterile, single-use device is intended to be used as an accessory to medicinal non-ventilatory nebulizers for respiratory therapy or for tracheal irrigation or lavage therapy.

This device is not intended for parenteral use or for preparations intended for parenteral use.

Prescription Use X  
(21 CFR 801 Subpart D)

and/or

Over-The-Counter Use \_\_\_\_\_  
(21 CFR 801 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE  
IF NEED)

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Concurrence of CDRH, Office of Device Evaluation (ODE)



(Division Sign-Off)

Division of Anesthesiology, General Hospital  
Infection Control, Dental Devices

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